

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
No.: 1:24-cv-17-LCB-JLW

JOHN DOE 1, et al.,

*Plaintiffs,*

v.

NORTH CAROLINA DEPARTMENT  
OF PUBLIC SAFETY, et al.,

*Defendants.*

**JOINT MOTION TO MODIFY  
CERTAIN CASE MANAGEMENT  
DEADLINES**

Pursuant to Local Civil Rule 7.3(j), the parties jointly and respectfully request that the Court enter an order modifying and extending certain case management deadlines so that the parties may focus their efforts on attempting to resolve this matter via a mediated settlement.

1. Since January 30, 2025, when the Court ordered the parties to return to mediation, the parties have made good progress towards settling this litigation. The parties have conducted mediated settlement conferences on March 12, 2025 and March 27, 2025 and have continued to dedicate significant resources to collaboratively resolving the issues in this litigation.

2. On April 3, 2025, the Court issued a Text Order setting the following case management deadlines:

- a. Completion of fact discovery on May 14, 2025;
- b. Expert Reports by Plaintiffs due June 4, 2025;
- c. Expert Reports by Defendants due July 2, 2025;

- d. Any rebuttal Expert Reports due August 1, 2025;
- e. Completion of Expert discovery/overall discovery on August 22, 2025.

3. The parties jointly and respectfully request that the Court enter an order modifying and extending the case management deadlines as follows:

- a. Completion of fact discovery on June 30, 2025;
- b. Expert Reports by Plaintiffs due July 21, 2025;
- c. Expert Reports by Defendants due August 18, 2025;
- d. Any rebuttal Expert Reports due September 15, 2025; and
- e. Completion of expert discovery/overall discovery on October 6, 2025.

4. The parties believe that an extension of the upcoming discovery deadlines will allow them to continue to dedicate their energies to settling this litigation, which requires the resolution of numerous complex issues that benefit from the full focus of the parties' counsel.

*[SIGNATURE PAGE FOLLOWS]*

This the 14th day of May 2025

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*\*Special Appearance Pursuant to Local Civil  
Rule 83.1(d)*